

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION  
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UNITED STATES OF AMERICA,

Plaintiff,

No. 1:11-CR-301

v.

Hon. Robert Holmes Bell  
United States District Judge

KEYON LADON GIBSON,

Defendant.  
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**MOTION FOR DOWNWARD DEPARTURE**

Now comes the United States of America, by its attorneys, Donald A. Davis, United States Attorney, and Heath M. Lynch, Assistant United States Attorney, and hereby moves for a downward departure at sentencing, pursuant to U.S.S.G. § 5K1.1 and 18 U.S.C. § 3553(e), for substantial assistance to the government as described in the accompanying brief.

Respectfully submitted,

DONALD A. DAVIS  
United States Attorney

Dated: May 21, 2012

/s/ Heath M. Lynch  
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